

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 13-74 (PJS/FLN)

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. MICHAEL ANTHONY SCHLEGEL,

Defendant.

**GOVERNMENT'S MOTION IN LIMINE
TO PRECLUDE DEFENDANT FROM
ARGUING RELIANCE ON ADVICE OF
COUNSEL DURING OPENING
STATEMENTS**

The United States of America, by and through its attorneys, John R. Marti, Acting United States Attorney for the District of Minnesota, and Tracy L. Perzel and John Kokkinen, Assistant United States Attorneys, hereby moves in limine to preclude the defendant from arguing during opening statements that he in good faith relied on the advice of counsel with respect to his conduct and actions related to taxes and interacting with the Internal Revenue Service. This motion in limine is based upon the files, records, and proceedings in the above-referenced action and on the Government's Trial Brief.

Dated: December 30, 2013

Respectfully Submitted,

JOHN R. MARTI
Acting United States Attorney

s/John Kokkinen

By: JOHN KOKKINEN
Assistant U.S. Attorney
Attorney ID No. 388356